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November 14, 2016

**ORIGINAL BY U.S. MAIL**

**VIA EMAIL [erojas@planning.lacounty.gov](mailto:erojas@planning.lacounty.gov)**

Laura Shell, Chair  
Los Angeles County Regional Planning Commission  
Los Angeles County  
320 West Temple Street  
Los Angeles, CA 90012

Re: Project No. R2015-03107-(3) / Tentative Parcel Map 073804 /  
Minor Coastal Development Permit 201500112  
Hearing Date: November 16, 2016  
Agenda Item 5  
**Opposition to Project Approval**

Dear Chair Shell and Honorable Commissioners:

This office represents Sophie Wong and the Wong Family (collectively, the "Wongs") with regard to their opposition to a new three (3) unit condominium development at 18225 Coastline Drive (the "Project"). Project approval will negatively impact immediately adjacent neighbors, such as the Wongs, who own the home located at 18248 Wakecrest Drive, to the rear of the Project site. While the Project has undergone some revisions as a result of the Commission's direction at the October 5, 2016 hearing, the Applicant has failed to address the impacts to ocean and coastline views from the properties behind the Project site. **The Project is inconsistent with the Santa Monica Mountains Local Coastal Program, findings in support of Project approval cannot be made, and we respectfully request that the Project be denied.**

**A. The Project is Inconsistent with the Santa Monica Mountains LCP.**

In 2014, the County acted to adopt the Santa Monica Mountains Local Coastal Program ("LCP") to guide development in the County's Santa Monica Mountains Coastal Zone consistent with the California Coastal Act. The very first overriding goal identified in the LCP's Land Use Plan ("LUP") is to "Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and manmade resources."

In furtherance of that goal the LUP identifies Goal LU-2: “A pattern of land use that promotes social, environmental, and economic well-being while preserving the environmental resources and unique character of the land within the Santa Monica Mountains.” Among the policies in the LUP that support this goal, the Project is flatly inconsistent with the following:

- **Policy LU-35:** *Require that new development preserve views of the ocean or Scenic Elements from public parkland, trails, Scenic Routes, and the principal permitted use on adjoining parcels. If there is a conflict between protecting views from public view areas and from private view areas, the protection of public views shall take precedence.*
- **Policy LU-38:** *Limit structure heights to ensure protection of scenic resources and compatibility with surrounding settings.*

The Wongs’ home currently enjoys expansive views of the ocean and coastline. The Wongs have anticipated that the vacant property below their home would eventually be developed, it now being the only vacant lot on Coastline Drive. However, the Wongs reasonably believed that such development would be subject to similar conditions of approval as the condominium project on the immediately adjacent lot, located at 18233 Coastline Drive. The project at 18233 Coastline Drive contained many conditions to ensure preservation of views from surrounding buildings. For example, the first floor line was required to be even with the building to the west, and upper floors and balconies were required to be pushed back from that vertical line. The project was not tiered, and excavation of the lot was required to ensure the height of the building did not block the views of the properties to the north. That project is now nearing completion, and as the most recent example of development in the area, the Project at issue here must be subject to similar conditions.

While LUP Policy LU-29 does require that disturbance of landforms be minimized, such policy acknowledges that constructing buildings on multilevel pads on hillsides is not always appropriate:

- **Policy LU-29:** *...protect the features that contribute to rural character and rural lifestyles by ... Minimizing disturbance of landforms and biological resources by requiring buildings on hillsides to be constructed on multilevel pads where appropriate...*

Here, the pattern of development along Coastline Drive west of the Project site is construction on one pad. Given the intense development of the area surrounding the Project site with single family homes and multi-family structures, any remnant hillside landform has already been significantly disturbed. Moreover, grading the Project site will help control and divert run-off, adding to the geologic stability of the site. While the multi-family buildings to the east of the Project site appear

to be built on multilevel pads, such development is unattractive and dated. The project at 18233 Coastline Drive clearly represents the better precedent for the community. Construction of the Project on a single building pad is appropriate under the circumstances, and would result in development more consistent with the LCP.

**B. Findings for Project Approval Cannot Be Made.**

To approve the requested Minor Coastal Development Permit, the specific finding must be made that the proposed development is in conformity with the LCP. Los Angeles County Code § 22.56.2320:

- "A. That the proposed development is in conformity with the certified local coastal program; and, where applicable,*
- B. That any development, located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, is in conformity with the public access and public recreation policies of Chapter 3 of Division 20 of the Public Resources Code."*

As discussed above, given the Project's impacts to the Wongs' protected views, the Project is not consistent with LUP Policy LU-35. In addition, the height of the Project is not compatible with surrounding settings given the interference with views from properties to the north, contrary to the requirements of LU-38.

Moreover, LUP Policy LU-29 specifically acknowledges that building on a single pad in a hillside area is appropriate in some circumstances. Given the significant disturbance of the topography in the immediate vicinity, preservation of the topography of the Project site will not serve the LUP's goal of enhancing the overall quality of the coastal zone environment. Instead, requiring construction of the Project on two pads will result in the appearance of taller structures looming over the single family homes south of the Project site.

The Project is not consistent with the Santa Monica Mountains Local Coastal Program, and the findings required by County Code § 22.56.2320 cannot be made.

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**C. Conclusion.**

The Project cannot be approved as proposed. Given the failure to minimize impacts to views from neighbors to the north, additional Project revisions are required to ensure consistency with the requirements of the Santa Monica Mountains Local Coastal Program. Based upon the foregoing, we respectfully request that the Project be denied.

Please do not hesitate to contact us at any time with any comments or questions that you may have. As always, thank you for your time and consideration.

Sincerely,

GAINES & STACEY LLP

By

  
FRED GAINES

cc: All Commission Members  
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